UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11, 2001 03 MDL 1570 (GBD)(SN) ECF Case

This document relates to:

Marinella Hemenway et al. v. Islamic Republic of Iran, No. 1:18-cv-12277 (GBD) (SN)

MOTION TO SUBSTITUTE PARTIES PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 15(d)

Pursuant to Federal Rules of Civil Procedure 15(d), Plaintiffs herein move the Court to allow substitution of the party as identified on Exhibit A in the above referenced action. The individual being substituted into the case is the Personal Representative of an individual killed as a result of the terrorist attacks on September 11, 2001 (a "9/11 decedent").

Exhibit A identifies the individual to be substituted in the pleading including the capacity in which they seeks to be substituted; state of residency at the time the complaint was instituted; identifies the existing pleading that makes reference to the plaintiff; and identifies the decedent of which the plaintiff is the Personal Representative.

Plaintiffs propose that, upon endorsement of Plaintiffs' Proposed Order, the substituted party would be individually entered as a Plaintiff into the Court's ECF system to ease the burden on the Clerk of the Court's Office and the size of this MDL.

Dated: August 20, 2019

/s/ Jerry S. Goldman

ANDERSON KILL P.C. Jerry S. Goldman, Esq. Bruce E. Strong 1251 Avenue of the Americas New York, NY 10020

Tel: 212-278-1000 Fax: 212-278-1733

Email: jgoldman@andersonkill.com

Arthur R. Armstrong, Esq. (pro hac vice) 1760 Market Street, Suite 600 Philadelphia, PA 19103

Tel: 267-216-2711 Fax: 15-568-4573

Email: aarmstrong@andersonkill.com